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May 29, 2007

## **E-FILED AND HAND DELIVERED**

The Honorable Joseph J. Farnan, Jr. United States District Court District of Delaware 844 N. King Street Room 4124, Lockbox 27 Wilmington, DE 19801

RE: Charles A. Stanziale v. Pepper Hamilton, et al., No. 04-1551 (JJF) Royal Indemnity Co. v. Pepper Hamilton LLP, et al., No. 05-165 (JJF)

Dear Judge Farnan:

Enclosed for the Court's consideration is the revised case management order for the Pepper Hamilton-related cases listed above, Civil Action Nos. 04-1551 and 05-165. The parties respectfully request that the Court enter this revised case management order. The defendants have all agreed to the revised schedule.

The revised case management order reflects the Court's ruling granting the Motion of Pepper Hamilton LLP and Robert Gagné, in His Capacity as an Attorney Practicing at Pepper Hamilton LLP, to Strike Expert Reports and Preclude Testimony of Douglas M. Branson, Nancy J. Moore and Steven L. Schwarcz entered on May 25, 2007 and is in accordance with the oral request made at the emergency hearing held on May 17, 2007 to amend the deadlines for submission of expert reports. Only the dates for (a) the defendants' submission of expert reports, (b) plaintiffs' submission of rebuttal expert reports, (c) the date of commencement of expert discovery and (d) the parties' submission of letters to the Court regarding issues to be raised on summary judgment have been extended by two (2) weeks. All other dates originally set forth in the Amended Case Management Order remain the same.

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We also enclose herewith our opposition to Plaintiffs' recently-filed "emergency motion" for leave to replace the stricken expert witnesses. The enclosed revised case management order assumes that the Court denies the relief requested by Royal Indemnity Company.

We are available at the Court's convenience should the Court have any questions or concerns.

Respectfully Submitted,

Wolfers W Solet In DBB by permission William H. Sudell, Jr.

DBB/clh

Enc.

cc: All Counsel on Attached Service List